

MEMO ENDORSED

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, NY 10005-1702

HELENE R. BANKS
ANIRUDH BANSAL
DAVID L. BARASH
LANDIS C. BEST
BRADLEY J. BONDI
BROCKTON B. BOSSON
JAMES J. CLARK
CHRISTOPHER W. CLEMENT
LISA COLLIER
AYANO K. CREED
SEAN M. DAVIS
STUART G. DOWNING
ADAM M. DWORKIN
ANASTASIA EFIMOVA
JENNIFER B. EZRING
HELENA S. FRANCESCHI
JOAN MURTAGH FRANKEL

JONATHAN J. FRANKEL
ARIEL GOLDMAN
JASON M. HALL
WILLIAM M. HARTNETT
NOLA B. HELLER
CRAIG M. HOROWITZ
DOUGLAS S. HOROWITZ
TIMOTHY B. HOWELL
DAVID G. JANUSZEWSKI
ELAI KATZ
BRIAN S. KELLEHER
RICHARD KELLY
CHÉRIE R. KISER*
JOEL KURTZBERG
TED B. LACEY
MARC R. LASHBROOK
ALIZA R. LEVINE

TELEPHONE: (212) 701-3000
WWW.CAHILL.COM

1990 K STREET, N.W.
WASHINGTON, DC 20006-1181
(202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP
24 MONUMENT STREET
LONDON EC3R 8AJ
+44 (0) 20 7920 9800

WRITER'S DIRECT NUMBER

JOEL H. LEVITIN
GEOFFREY E. LIEBMANN
BRIAN T. MARKLEY
MEGHAN N. McDERMOTT
WILLIAM J. MILLER
NOAH B. NEWITZ
DAVID R. OWEN
JOHN PAPACHRISTOS
LUIS R. PENALVER
KIMBERLY PETILLO-DÉCOSSARD
SHEILA C. RAMESH
MICHAEL W. REDDY
OLEG REZZY
THORN ROSENTHAL
TAMMY L. ROY
JONATHAN A. SCHAFFZIN
MICHAEL A. SHERMAN

DARRICK SIEVER
JOSIAH M. SLOTNICK
RICHARD A. STIEGLITZ JR.
ROSS E. STURMAN
SUSANNA M. SUH
ANTHONY K. TAMA
JONATHAN D. THIER
SEAN P. TONOLI
JOHN A. TRIPODORO
GLENN J. WALDRIP, JR.
HERBERT S. WASHER
MICHAEL B. WEISS
DAVID WISHENGRAD
COREY WRIGHT
JOSHUA M. ZELIG
DANIEL J. ZUBKOFF

* ADMITTED IN DC ONLY

(212) 701-3207

August 10, 2020

Re: United States v. Michael Del Villar, 20-cr-295 (VEC)

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Dear Judge Caproni,

I respectfully submit this letter on behalf of the defendant Michael Del Villar, to seek, with consent from the Government and Pretrial Services, a modification to the terms of his pretrial release.

The current conditions of Mr. Del Villar's pretrial release require home detention (with GPS electronic monitoring) except, as approved by Pretrial Services, for the purposes of verifiable employment, medical visits for himself and his immediate family, and attorney visits. Mr. Del Villar currently resides in the Central District of California and has obtained employment as a floor assistant at a furniture store in Los Angeles. Currently, he assists with the merchandise on the premises, but his employer has asked him to make deliveries by truck in the greater Los Angeles area, something currently not permitted by the terms of his release (although the terms require him to maintain employment).

In addition, Mr. Del Villar resides with his girlfriend and two daughters, two and a half years and four months, respectively. Mr. Del Villar's girlfriend needs help procuring necessities for their young family, such as diapers, groceries, and gas for their car, which, under his current terms of release, Mr. Del Villar cannot provide. Accordingly, we respectfully request that the

CAHILL GORDON & REINDEL LLP

-2-

Court modify the terms of Mr. Del Villar's pretrial release from home detention to include a curfew, enforced by GPS electronic monitoring, with the hours to be set by Pretrial Services.

The Government and Pretrial Services in the Southern District of New York and the Central District of California consent to this request.

Application GRANTED.

SO ORDERED.


8/11/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Anirudh Bansal

Anirudh Bansal

Counsel for Michael Del Villar

cc: Brett Kalikow, Assistant United States Attorney (via e-mail)
United States Pretrial Services Officer Ashley Cosme (via e-mail)
United States Pretrial Services Officer Tiffany Rivers (via e-mail)
United States Pretrial Services Officer Brenda Mercado (via e-mail)